

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

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IN RE AUTOMOTIVE PARTS  
ANTITRUST LITIGATION

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:  
: Master File No. 12-md-02311  
: Honorable Marianne O. Battani  
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ALL PARTS

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THIS DOCUMENT RELATES TO:  
ALL CASES

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**SECOND SUPPLEMENT TO MOTION TO MODIFY  
STIPULATED ORDER OF DISCOVERY**

End-Payor Plaintiffs (“EPPs”) hereby provide this second supplement to their motion to modify the stipulated order of discovery of August 21, 2014 (ECF No. 783), which was first supplemented on August 27, 2014 (ECF No. 789).

The motion had identified JTEKT Corporation (“JTEKT”) as a defendant with whom EPPs were unable to meet and confer. After ECF No. 789 was filed, counsel for JTEKT (“JTEKT”) Corporation contacted counsel for EPPs for the first time to suggest that the statement that JTEKT had not met and conferred with EPPs was incorrect. According to JTEKT’s counsel, it participated in an open conference call with four other guilty-pleading defendants. Neither EPPs’ recollection nor records reflect that JTEKT attended the meet and confer call, and counsel for JTEKT did not express any statement concerning the relief requested

by EPPs. In the spirit of cooperation, however, EPPs agree to state that we met and conferred with JTEKT, which did not consent to the relief we sought.

Date: August 28, 2014

Respectfully submitted,

/s/ Elizabeth Tran

Frank C. Damrell

Steven N. Williams

Adam J. Zapala

Elizabeth Tran

**COTCHETT, PITRE & McCARTHY,  
LLP**

San Francisco Airport Office Center

840 Malcolm Road, Suite 200

Burlingame, CA 94010

Telephone: (650) 697-6000

Facsimile: (650) 697-0577

fdamrell@cpmlegal.com

swilliams@cpmlegal.com

azapala@cpmlegal.com

etran@cpmlegal.com

/s/ Hollis Salzman

Hollis Salzman

Bernard Persky

William V. Reiss

**ROBINS, KAPLAN, MILLER & CIRESI  
L.L.P.**

601 Lexington Avenue, Suite 3400

New York, NY 10022

Telephone: (212) 980-7400

Facsimile: (212) 980-7499

hsalzman@rkmc.com

bpersky@rkmc.com

wvreiss@rkmc.com

/s/ Marc. M. Seltzer

Marc M. Seltzer

Steven G. Sklaver

**SUSMAN GODFREY L.L.P.**

1901 Avenue of the Stars, Suite 950  
Los Angeles, CA 90067-6029  
Telephone: (310) 789-3100  
Facsimile: (310) 789-3150  
mseltzer@susmangodfrey.com  
ssklaver@susmangodfrey.com

Terrell W. Oxford

Warren T. Burns

**SUSMAN GODFREY L.L.P.**

901 Main Street, Suite 5100  
Dallas, Texas 75202  
Telephone: (214) 754-1900  
Facsimile: (214) 754-1933  
toxford@susmangodfrey.com  
wburns@susmangodfrey.com

*Interim Co-Lead Class Counsel for the  
Proposed End-Payor Plaintiffs Classes*

/s/ E. Powell Miller

E. Powell Miller

Adam T. Schnatz

**THE MILLER LAW FIRM, P.C.**

The Miller Law Firm, P.C.  
950 W. University Dr., Ste. 300  
Rochester, Michigan 48307  
epm@millerlawpc.com  
ats@millerlawpc.com

*Attorneys for Plaintiffs and Interim Liaison  
Counsel for the Proposed End-Payor  
Plaintiffs Classes*

**CERTIFICATE OF SERVICE**

I, Steven N. Williams, hereby certify that I caused a true and correct copy of the **SECOND SUPPLEMENT TO MOTION TO MODIFY STIPULATED ORDER OF DISCOVERY** to be served via e-mail upon all registered counsel of record via the Court's CM/ECF system on August 28, 2014.

/s/ Steven N. Williams

Steven N. Williams